

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 21-71
)	
WILLIAM KAETZ)	

JOINT MOTION TO EXTEND PRETRIAL DEADLINES

AND NOW comes the Defendant, William Kaetz, through his attorney, Douglas Sughrue, and the United States of America, through its counsel, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, Cindy K. Chung and Tonya S. Goodman, Assistant United States Attorneys for said district, and file this motion to extend all outstanding pretrial deadlines, and sets forth the following:

1. On April 9, 2021, the Court entered an order scheduling certain pretrial deadlines in this matter. Doc. No. 65. On April 21, 2021, the defendant moved to change venue in this matter to the Western District of Pennsylvania. Doc. No. 67. On April 27, 2021, the Court granted the motion and venue in this matter was transferred to the Western District of Pennsylvania (“WDPA”). Doc. No. 69. On that same date, Chief Judge Mark Hornak entered an administrative order in this district setting forth procedures for conducting trials in the WDPA, including on a “one trial at a time’ basis in each of the Court’s Divisions.” Misc. No. 2:20-mc-394-MRH, Doc. No. 20.

2. The pretrial deadlines were set in anticipation that this case would be “set down for trial [in] late June/early July, at the earliest.” Doc. No. 65. Given the ongoing concerns raised by COVID-19, it now appears that trial will not be set for sometime later, perhaps late August or September. See, e.g., Misc. No. 2:20-mc-394-MRH, Doc. No. 20.

3. The parties respectfully request that all pending pretrial deadlines be extended for a period of 30 days. A proposed order is attached. As the latest deadline in this matter is set for June 14, 2021, the parties submit that such an extension will have no impact on a trial date in this

matter and will not prejudice either party

WHEREFORE, the parties respectfully request that the current pending deadlines be extended by thirty days.

Respectfully submitted,

By:

s/ Douglas Sughrue
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Acting Under Authority Conferred by 28 U.S.C. § 515

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